

1 Ramon Rossi Lopez - rlopez@lopezmchugh.com
(California Bar Number 86361; admitted *pro hac vice*)
2 Lopez McHugh LLP
100 Bayview Circle, Suite 5600
3 Newport Beach, California 92660
949-812-5771

4 Mark S. O'Connor (011029) – moconnor@beusgilbert.com
5 BEUS GILBERT, PLLC
701 N.44th St.
6 Phoenix AZ 85008
480-429-3019

7 *Co-Lead/Liaison Counsel for Plaintiffs*

8
9 UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF ARIZONA

11 In Re Bard IVC Filters Products
12 Liability Litigation

No. MD-15-02641-PHX-DGC

13 **STIPULATION REGARDING**
14 **SUPPLEMENTATION OF PLAINTIFF'S**
MOTION IN LIMINE NO. 2 RE VENA
CAVA SIZE

15 (Assigned to the Honorable David G.
16 Campbell)

17 **(Tinlin Bellwether Case)**

18 The parties, by and through their counsel undersigned, hereby stipulate as follows:

19 1. Plaintiff may file a Supplemental Motion *in Limine* No. 2 Regarding Vena
20 Cava Size to include testimony from Dr. Christopher Morris' March 29, 2019 deposition,
21 for which the final deposition transcript became available April 5, 2019.

22 2. Defendants will file a Response to the above described motion within two
23 weeks from the date of Plaintiff's filing or in accordance with any deadline the Court
24 chooses to impose.
25
26
27
28

RESPECTFULLY SUBMITTED this 8th day of April 2019.

BEUS GILBERT, PLLC

NELSON MULLINS RILEY &
SCARBOROUGH, LLP

By: /s/ Mark S. O'Connor

By: /s/ Richard B. North, Jr.

Mark S. O'Connor (011029)
701 N.44th St.
Phoenix AZ 85008

Richard B. North, Jr.
Georgia Bar No. 545599
Matthew B Lerner
Georgia Bar No. 446986
Atlantic Station
201 17th Street, NW, Ste. 1700

LOPEZ McHUGH LLP
Ramon Rossi Lopez (CA Bar No.
86361)
(admitted *pro hac vice*)
100 Bayview Circle, Suite 5600
Newport Beach, California 92660

SNELL & WILMER L.L.P.
James R. Condo (#005867)
Kristine L. Gallardo (#033975)
One Arizona Center
400 E. Van Buren
Phoenix, AZ 85004-2204

Co-Lead/Liaison Counsel for Plaintiffs

*Attorneys for Defendants C.R. Bard, Inc.
and Bard Peripheral Vascular, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine